

## Remarks

Claims 1-10 are pending in this application. Applicants have amended claims 1 and 8 to clarify the claimed invention. Claims 2, 3, 5, 9, and 10 are withdrawn from consideration by the Examiner as directed to non-elected species. Applicants respectfully request favorable reconsideration of this application.

With respect to the election requirement, the claims in the international application correspond to the claims submitted in claims submitted with the national phase application with the exception of formal amendments. The fact that the international preliminary report on patentability indicated that all claims are allowable is irrelevant. Unity of invention may be present or lacking regardless of whether the claims are allowable. Applicants respectfully request that the election requirement be withdrawn.

With respect to the rejection of claim 8 under 35 U.S.C. § 112, second paragraph, the expression "arbitrary", this is meant to express that the blower module may be attached to the heating element module at any position along the extension thereof and still permit convection heating to be maintained through some of the fins of the plurality of fins provided on the at least one pipe of the heating element module. Applicants wish to point out that the claims recite that the blower module(s) is/are arranged to be selectively operable to produce a forced airflow through some of the plurality of fins while maintaining unforced convection heating through other fins of the plurality of fins is maintained. One of ordinary skill in the art would be readily apprised of where the blower module(s) may be attached. Applicants submit that the claims

comply with 35 U.S.C. § 112, second paragraph, and respectfully request withdrawal of this rejection.

The Examiner rejected claims 1, 3, and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over WO 01/89967, DE 19708815 or KR 2003-0031372 in view of U.S. patent 4,257,554 to Willingham. The Examiner rejected claims 1, 3, and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over WO 01/89967, DE 19708815 or KR 2003-0031372 in view of Willingham and further in view of JP 1-160722. The Examiner rejected claims 1, 3, 4, and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over WO 01/89967, DE 19708815 or KR 2003-0031372 in view of Willingham with or without JP 1-160722 and further in view of JP 1-266465.

None of the cited references suggests the claimed invention since, among other things, none of the cited references suggests a heating system that utilizes natural convection and forced air from blower modules. As a result, the claimed invention will produce a mixture of ascending and descending air above and below the heating system. This will help to prevent cold drafts at users' feet or above the heating system. As a result, the claimed invention will provide a more pleasant atmosphere in the vehicle in which the heating system is installed.

On the other hand, WO 01/89967 only suggests forced air flow both upwardly and downwardly with a fan. DE19708815 only suggests forced air flow downwardly with a fan. KR 2003-0031372 only suggests forced air flow downwardly with a fan.

Willingham only suggests air flow in one direction through vehicle radiator. Willingham does not even suggest a vehicle heater. Therefore, Willingham is not properly combinable with WO 01/89967, DE 19708815 or KR 2003-0031372, which all appear to suggest vehicle interior heaters. Additionally, Willingham is non-analogous art with respect to the claimed invention.

JP 1-160722 appears to suggest only upward convection heating. The abstract of JP 1-266465 clearly describes that natural convection only occurs when the fan is not operating. Therefore, JP 1-266465 also does not suggest upward natural convection and downward directed air flow.

In view of the above, the references relied upon in the office action, whether considered alone or in combination, do not suggest patentable features of the claimed invention. Therefore, the references relied upon in the office action, whether considered alone or in combination, do not make the claimed invention obvious. Accordingly, Applicant respectfully requests withdrawal of the rejection based upon the cited references.

In conclusion, Applicant respectfully requests favorable reconsideration of this case and early issuance of the Notice of Allowance.

If an interview would advance the prosecution of this application, Applicant respectfully urges the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit

overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date: May 25, 2010

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